



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Northern Virginia Regional Office
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Woodbridge, VA 22193-1453
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STATE AIR POLLUTION CONTROL BOARD ENFORCEMENT ACTION ORDER BY CONSENT ISSUED TO

Stephenson Printing Inc.
DEQ Registration No. 71908

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code § 10.1-1307.D, 10.1-1316, and 10.1-1309, between the State Air Pollution Control Board (SAPCB) and Stephenson Printing Inc., for the purpose of resolving certain alleged violations of the air permit and regulations as specified in SECTION C of this Order.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "Board" means the State Air Pollution Control Board, a permanent collegial body of the Commonwealth of Virginia as described in Code §§ 10.1-1301 and 10.1-1184.
2. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia as described in Va. Code § 10.1-1183.
3. "Director" means the Director of the Department of Environmental Quality.

4. "Facility" means Stephenson Printing Inc., located at 5731 General Washington Drive, Alexandria, Virginia 22312 (Fairfax County).
5. "VOC" means Volatile Organic Compounds.
6. "MNSR" means Minor new Source Review.
7. "NVRO" means the Northern Virginia Regional Office of DEQ, located in Woodbridge, Virginia.
8. "Order" means this document, also known as a Consent Order.
9. "Regulations" refers to the Regulations for the Control and Abatement of Air Pollution for the Commonwealth of Virginia.
10. "SAPCB Regulations" mean the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.
11. "VAC" means Virginia Administrative Code.
12. "Va. Code" means the Code of Virginia (1950), as amended.

SECTION C: Findings of Fact

1. Stephenson Printing, Inc. (Facility Registration No. 71908) operates a lithographic printing facility at 5731 General Washington Drive in Alexandria, Virginia. The facility currently operates one 8-unit Heidelberg/Harris M1008-B heatset, web offset lithographic printing press, equipped with an Ecotherm C Drying System, model E105-1020, with built in afterburner; one 6-unit, Heidelberg/Harris M1006-BE heatset, web offset lithographic printing press, equipped with a 6.04 million Btu/hr input capacity, Advanced Systems, Inc., Model: S3206D1 drying oven, with a regenerative thermal oxidizer (RTO) Model #TR 492C; one 8-color Roland/Miehle Model 708P non-heatset, sheet-fed offset lithographic printing press; and two 6-color Roland/Miehle Model 406C non-heatset, sheet-fed offset lithographic printing presses.
2. The heatset printers are permitted under a Stationary Source Permit to Construct and Operate (MNSR Permit) amended April 27, 2006, from an original permit dated February 6, 2001. The permit amendment was necessary to account for the replacement of the direct flame incinerator with a regenerative thermal oxidizer on the 6-unit, Heidelberg/Harris M1006-BE heatset, web offset printing press.
3. A partial compliance evaluation (PCE) of this facility was conducted with an on-site inspection on October 31, 2006 to determine the facility's compliance with the

applicable SAPCB regulations and the aforementioned Permit. The PCE inspection report, dated November 2, 2006, stated that the facility was apparently out of compliance with several permit conditions as detailed below:

- a. The facility did not appear to be operating the RTO with the prescribed temperature set point and could not provide records of the combustion temperature of the RTO in accordance with Permit Condition 5.
 - b. According to a review of facility records during the inspection, the facility appeared to be using some inks that did not fall within the allowable volatile organic compound (VOC) content limits of 38% by weight in accordance with Permit Condition 9.
 - c. According to a review of facility records during the inspection, the facility did not appear to be keeping records of its ink throughput for the most recent 12 consecutive months in accordance with Permit Conditions 7 and 8.
 - d. According to a review of facility records during the inspection, the facility did not appear to be keeping records of its fugitive VOC emissions for the most recent 12 consecutive months in accordance with Permit Condition 14.
 - e. According to a review of facility records during the inspection, the facility did not appear to be keeping records of its annual VOC emissions for the most recent 12 consecutive months in accordance with Permit Condition 15.
 - f. According to a review of facility records during the inspection, the facility did not appear to be keeping maintenance records, equipment operating procedures, spare parts inventories, or training records on site in accordance with Permit Condition 25.
 - g. According to a review of facility records during the inspection, the facility did not appear to be keeping records of all emission data and operating parameters in accordance with Permit Condition 19.
 - h. According to a review of facility records during the inspection, the facility appeared to have not completed initial performance testing on the RTO to determine compliance with opacity requirements and short-term VOC emission limits in accordance with Permit Conditions 17 and 18.
4. DEQ issued a Notice of Alleged Violation (NOAV), to Stephenson Printing, Inc. on November 30, 2006, addressing the aforementioned alleged violations.
 5. Stephenson Printing Inc. responded to the NOAV with a phone call on December 11, 2006, in which Stephenson Printing Inc. requested that a meeting be set up with DEQ in order to discuss the NOAV on December 19, 2006. Stephenson Printing Inc. also

responded with a formal letter on December 18, 2006, in which all of the apparent violations were addressed. At that time, Stephenson Printing Inc. informed DEQ that all purchased ink complied with the 38% maximum VOC content limit in the Permit. Material Safety Data Sheets (MSDS) observed during the inspection were from ink samples not used at the facility. Also, all records were updated through October 2006, (representing the most current supplier invoice data). The RTO temperature was corrected and set to 1505 degrees Fahrenheit as of November 8, 2006, and records indicate that, since that date, the RTO has not run below the 1500 degrees Fahrenheit Permit limit. During the meeting, it was also decided that Stephenson Printing Inc. could perform the stack test on the RTO at 1420 degrees Fahrenheit as it was their belief that they could meet their emissions limits at a lower temperature. Stephenson Printing Inc. also made a request to make modifications to their permit at a later date.

6. Stephenson Printing Inc. scheduled stack testing of the regenerative thermal oxidizer (RTO) with Blue Mountain Environmental Management Services for January 16, 2007. DEQ personnel made a site-visit to the facility on the morning of January 16, 2007, to observe stack testing. The original start-up date for the RTO was July 26, 2006, and the RTO did not run at maximum production; therefore, the 180 day deadline applies under Permit Condition 17. The stack test falls within the 180 day post-start-up deadline in the Permit. Detailed observations of the stack test are documented in a January 16, 2007, PCE inspection report. Initial calculations from the testing show that the RTO was operating at around 99.5% efficiency and VOC emissions were around 0.08 lbs/hr, below its short-term permit emission limit of 0.12 lbs/hr. DEQ review of the subsequently submitted February 6, 2007, Stack Test Report appears to verify preliminary emissions calculations with a RTO operation efficiency of 99.5% and an average VOC emission of 0.082 lb/hr. The stack test report appears to place the facility into compliance with applicable permit emission limits and verifies that the facility did not exceed their emission limits or cause environmental harm while running the RTO at 1420 degrees Fahrenheit.
7. Appendix A of this Order requires Stephenson Printing, Inc. to submit a corrective action plan to assure future compliance with the Permit and all applicable regulations.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code §10.1-1316(C), the Board orders the Stephenson Printing Inc., and Stephenson Printing Inc. voluntarily agrees, to perform the actions described in Appendix A of this Order. In addition, the Board orders the Stephenson Printing Inc., and Stephenson Printing Inc. voluntarily agrees to pay a civil charge in the amount of \$7,508.00. The civil charge is due within 30 days of the effective date of the Order in settlement of the violations cited in this Order. Payment shall be made by check payable to the "Treasurer of Virginia", delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

SECTION E: Administrative Provisions

1. The Board may modify, rewrite, or amend the Order with the consent of Stephenson Printing Inc., for good cause shown by Stephenson Printing Inc., or on its own motion after notice and opportunity to be heard.
2. This Order only addresses and resolves those violations specifically identified herein, including those matters addressed in the Notice of Violation issued November 30, 2006. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility as may be authorized by law; or (3) taking subsequent action to enforce the Order. This Order shall not preclude appropriate enforcement actions by other federal, state, or local regulatory authorities for matters not addressed herein.
3. For purposes of this Order and subsequent actions with respect to this Order, Stephenson Printing Inc. admits the jurisdictional allegations, factual findings, and conclusions of law contained herein.
4. Stephenson Printing Inc. consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.
5. Stephenson Printing Inc. declares it has received fair and due process under the Administrative Process Act, Va. Code §§ 9-6.14:1 *et seq.*, and the State Air Pollution Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to enforce this Order.
6. Failure by Stephenson Printing Inc. to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.

7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
8. Stephenson Printing Inc. shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other occurrence. Stephenson Printing Inc. shall show that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. Stephenson Printing Inc. shall notify the DEQ Regional Director in writing when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:
 - a. the reasons for the delay or noncompliance;
 - b. the projected duration of any such delay or noncompliance;
 - c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and
 - d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director within 24 hours of learning of any condition above, which the parties intend to assert will result or has resulted in the impossibility of compliance, shall constitute a waiver of any claim of inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto, their successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and Stephenson Printing Inc. Notwithstanding the foregoing, Stephenson Printing Inc. agrees to be bound by any compliance date that precedes the effective date of this Order.
11. This Order shall continue in effect until the Director or Board terminates the Order in his or its sole discretion upon 30 days written notice to Stephenson Printing Inc. Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve Stephenson Printing Inc. from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. By its signature below, Stephenson Printing Inc. voluntarily agrees to the issuance of this Order.

And it is so ORDERED this day of MAY 14, 2007.

Jeffery A. Steers
Jeffery A. Steers, Regional Director
Department of Environmental Quality

Stephenson Printing Inc. voluntarily agrees to the issuance of this Order.

By: George W. Stephenson
Date: 5-11-07

Commonwealth of Virginia
City/County of Fairfax

The foregoing document was signed and acknowledged before me this day of

May 11, 2007, by George W. Stephenson, who is
(name)

president of Stephenson Printing Inc., on behalf of the Organization.
(title)



[Signature]
Notary Public

My commission expires: July 31, 2008

APPENDIX A

As part of the resolution of this Consent Order, Stephenson Printing Inc. shall submit a corrective action plan to the Air Compliance Manager of the Northern Virginia Regional Office at the Department of Environmental Quality within 30 days of the execution of the Consent Order, in order to assure future compliance with the Permit and all applicable regulations. The corrective action plan shall include any steps the facility plans to take in order to comply with each of the Permit Conditions that the facility appeared to have violated as set forth in the Notice of Alleged Violation, with specific emphasis on all Permit recordkeeping requirements.